

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

BENSLEY CONSTRUCTION, INC., on its own
behalf and on behalf of all others similarly situated,

Plaintiff,

v.

MARSH & MCLENNAN COMPANIES, INC.,
MARSH, INC., ACE USA, ACE INA, AMERICAN
INTERNATIONAL GROUP, AMERICAN
REINSURANCE COMPANY, ARTHUR J.
GALLAGHER & CO., HILB ROGAL & HOBBS,
COMPANY, WILLIS GROUP HOLDINGS, LTD.,
WILLIS NORTH AMERICA INC., WILLIS GROUP
LTD., UNIVERSAL LIFE RESOURCES,
UNIVERSAL LIFE RESOURCES, INC. (d/b/a ULR
INSURANCE SERVICES, INC.), THE CHUBB
CORPORATION, USI HOLDINGS, INC., METLIFE,
INC., PRUDENTIAL FINANCIAL, INC.,
UNUMPROVIDENT CORPORATION, THE ST.
PAUL TRAVELERS COMPANIES, INC., ZURICH
AMERICAN INSURANCE COMPANY, LIBERTY
MUTUAL GROUP INC., LIBERTY MUTUAL
INSURANCE COMPANY, LIBERTY MUTUAL
FIRE INSURANCE COMPANY, EMPLOYERS
INSURANCE COMPANY OF WAUSAU, and ST.
JAMES INSURANCE COMPANY LTD.,

Defendants.

Civil Action No. 05 11249 GAO

**MOTION FOR ADMISSION OF JOHN F. COLLINS
TO PRACTICE BEFORE THIS COURT PRO HAC VICE**

Pursuant to this Court's Local Rule 83.5.3(b), Paula M. Bagger, a member in good standing of the Bar of this Court and counsel to defendant American Re-Insurance Company herein, hereby moves that attorney John F. Collins, a member in good standing

of the New York State Bar and the Bar of the United States District Court for the Southern District of New York, be granted leave to appear on behalf of defendant American Re-Insurance Company and practice in this Court *pro hac vice* in the above-captioned action.

As set forth in the accompanying Affidavit of John F. Collins in support of this motion for admission *pro hac vice*:

1) Mr. Collins is a partner with the firm of Dewey Ballantine LLP, 1301 Avenue of the Americas, New York, NY 10019-6092.

2) Mr. Collins is a member in good standing in every jurisdiction in which he is admitted to practice;

3) There are no disciplinary proceedings pending against Mr. Collins in any jurisdiction; and

4) Mr. Collins is familiar with the local rules of the United States District Court for the District of Massachusetts.

WHEREFORE, Paula M. Bagger respectfully requests that this Motion be allowed and that John F. Collins be granted leave to appear on behalf of defendant American Re-Insurance Company and practice in this Court *pro hac vice* in the above-captioned action.

AMERICAN REINSURANCE COMPANY

By its attorneys

_____/s/ Paula M. Bagger_____
Paula M. Bagger (BBO No. 547703)
COOKE CLANCY & GRUENTHAL LLP
265 Franklin Street
Boston, MA 02110
(617) 428-6800

Dated: July 1, 2005

CERTIFICATE OF SERVICE

I, Paula M. Bagger, hereby certify that I have served a true copy of the foregoing on those counsel on the attached service list who do not otherwise receive electronic notice, by first-class mail, postage prepaid, this 1st day of July, 2005

_____/s/ Paula M. Bagger_____

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**AFFIDAVIT OF JOHN F. COLLINS IN SUPPORT
OF MOTION FOR ADMISSION *PRO HAC VICE***

I, John F. Collins, being duly sworn, depose and say:

1. I am a partner in the New York, New York law firm of Dewey Ballantine LLP. Our offices are located at 1301 Avenue of the Americas, New York, New York, 10019-6092.

2. I am a member of the Bar of the State of New York and of the United States District Court for the Southern District of New York. I am a member in good standing of the bar in each jurisdiction to which I have been admitted to practice.

3. There are no disciplinary proceedings pending against me in any jurisdiction.

4. I am familiar with the Local Rules of the United States District Court for the District of Massachusetts.

Signed under the pains and penalties of perjury this 30th day of June, 2005.

/s/ John F. Collins
John F. Collins